

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7
Oscar Gonzalez de Llano
Special Assistant United States Attorney
Office of the General Counsel
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4818
Email: Oscar.Gonzalez@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security (the “Commissioner”), shall have an extension of time to respond to Plaintiff’s Complaint in this case. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due February 21, 2023. Defendant has not previously requested an extension of this deadline.

2. The certified administrative record (CAR) in this case has not been finalized for filing. The agency's Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel for the Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. OAO has indicated it needs additional time to prepare the CAR, accordingly, Defendant requests an extension of 60 days to respond to Plaintiff's Complaint.

3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that they have no objections.

4. This request is made in good faith and is not intended to delay the proceedings in this matter.

WHEREFORE, Defendant requests until April 22, 2023, respond to Plaintiff's Complaint.

Respectfully submitted,

Date: February 22, 2023

By: /s/ Young Chul Cho *

Young Chul Cho

Law Offices of Lawrence D. Rohlfing

Attorneys for Plaintiff

*Authorized by email

1
2 Date: February 22, 2023
3

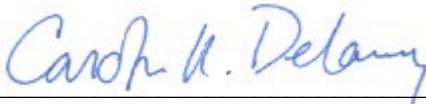
PHILIP A. TALBERT
United States Attorney
Eastern District of California

4 By: /s/ Oscar Gonzalez de Llano
5 OSCAR GONZALEZ de LLANO
6 Special Assistant United States Attorney
7 Attorneys for Defendant

8
9 ORDER
10

11 APPROVED AND SO ORDERED.
12

13 Dated: February 22, 2023
14



15
16 CAROLYN K. DELANEY
17 UNITED STATES MAGISTRATE JUDGE
18
19
20
21
22
23
24
25
26
27
28